Case 08-35653-KRH Doc 269 Filed 11/20/08 Entered 11/20/08 16:54:58 Desc Main Document Page 1 of 3

SPOTTS FAIN PC

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:

CIRCUIT CITY STORES, INC. et al.,

Debtors.

Chapter 11

Case No. 08-35653-KRH

(Jointly Administered)

NOTICE OF DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that Entergy Mississippi, Inc. ("<u>EMI</u>"), Entergy Gulf States Louisiana, L.L.C. ("<u>EGSL</u>"), Entergy Louisiana, LLC ("<u>ELL</u>"), Entergy Arkansas, Inc. ("<u>EAI</u>") and Entergy Texas, Inc. ("<u>ETI</u>", and together with EMI, EGSL, ELL and EAI, "<u>Entergy</u>"), pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and Bankruptcy Rule 7030, will take the oral deposition of the Rule 30(b)(6) designee of the above captioned debtors and debtors-in-possession (the "Deponent"), in the offices of Spotts Fain, PC, 1411 E. Franklin Street, Suite 600, Richmond,

Case 08-35653-KRH Doc 269 Filed 11/20/08 Entered 11/20/08 16:54:58 Desc Main Document Page 2 of 3

Virginia 23219, on December 3, 2008, beginning at 1:00 p.m. (Prevailing Eastern Time). The

deposition will be taken by a notary public, court reporter, or other authorized person and will

continue from day to day until complete.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 30(b)(6) of the Federal

Rules of Civil Procedure and Bankruptcy Rule 7030 the Deponent shall designate one or more

officers, directors, or managing agents, or other persons most knowledgeable and best qualified to

testify concerning the matters listed on Exhibit A hereto.

PLEASE TAKE FURTHER NOTICE that the examination will be taken before a

notary public or other official authorized by law to administer oaths, and will be recorded by

stenographic means.

PLEASE TAKE FURTHER NOTICE that the Deponent is requested to produce at the

deposition all such documents designated on Exhibit B hereto.

Dated: November 20, 2008

SPOTTS FAIN PC

/s/ Jennifer J. West

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- 2 -

Exhibit "A"

- 1. The allegations contained in and the factual basis for the Motion Of Debtors For Order Under Bankruptcy Code Sections 105(a), 363, And 366 And Bankruptcy Rule 6003 (I) Approving Debtors' Adequate Assurance Of Payment, (II) Establishing Procedures For Resolving Requests By Utility Companies For Additional Assurance Of Payment, (III) Scheduling A Hearing With Respect To Contested Adequate Assurance Of Payment Requests, And (IV) Authorizing Debtors To Pay Claims Of A Third Party Vendor [Docket No. 8] (the "Utility Motion").
- 2. The pre-petition and post-petition finances of the Debtors, including, but not limited to: liquidity, projected cash flows, and budgets.
- 3. The allegations contained in and the factual basis for the Declaration of Bruce H. Besanko, Executive Vice President & Chief Financial Officer Of Circuit City Stores, Inc.) In Support Of Chapter 11 Petitions And First Day Pleadings [Docket No. 22].
- 4. The status of any and all regulatory proceedings involving the Debtors.
- 5. The information contained in the documents designated in Exhibit B.

Exhibit "B"

- 1. All documents that you intend to offer into evidence at any evidentiary hearing on any additional adequate assurance Payment Requests.
- 2. All documents constituting, concerning or relating to financial projections of the Debtors postpetition, including without limitation any documents referring or relating to the projected cash position of the Debtors over the next 12 months.
- 3. All documents constituting, concerning or relating to the Debtors' projected and actual cash flows and liquidity postpetition, including without limitation, internal memoranda, correspondence, projections of income and expenses, post-petition financing orders, cash collateral budgets, and the like.